

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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SHIRLEY T BURTON,
Plaintiff,
-against-

ANSWER
13 cv 1426

NATIONS RECOVERY CENTER, INC AND
ATLANTIC CREDIT & FINANCE SPECIAL
FINANCE UNIT III, LLC.,

Defendant(s).

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Defendant, **NATIONS RECOVERY CENTER, INC**, by its attorney Mel S. Harris and Associates, LLC, answers plaintiff's complaint as follows:

1. Defendant acknowledges being sued pursuant to the Fair Debt Collection Practices Act, but denies any violation thereof.
2. There are no factual allegations in paragraph "2" of the complaint and as a result, defendant is not required to admit or deny the allegations in paragraph "2" of the complaint.
3. Defendant admits the allegations contained in paragraph "3" of the complaint.
4. Defendant admits the allegations contained in paragraph "4" of the complaint.
5. Defendant denies knowledge or information sufficient to form a belief as to the allegations contained in paragraph "5" of the complaint.
6. Defendant denies knowledge or information sufficient to form a belief as to the allegations contained in paragraph "6" of the complaint.
7. Defendant denies knowledge or information sufficient to form a belief as to the allegations contained in paragraph "7" of the complaint.

8. Defendant denies knowledge or information sufficient to form a belief as to the allegations contained in paragraph "8" of the complaint.

9. Defendant denies knowledge or information sufficient to form a belief as to the allegations contained in paragraph "9" of the complaint.

10. Defendant admits the allegations contained in paragraph "10" of the complaint.

11. Defendant admits the allegations contained in paragraph "11" of the complaint.

12. Defendant admits the allegations contained in paragraph "12" of the complaint.

13. Defendant denies each and every allegation contained in paragraph "13" of the complaint.

14. Defendant admits sending correspondence to the plaintiff, but denies knowledge or information sufficient to form a belief as to the date of receipt of that correspondence by the plaintiff.

15. Defendant admits the allegations contained in paragraph "15" of the complaint.

16. Defendant admits the allegations contained in paragraph "16" of the complaint.

17. Defendant denies knowledge or information sufficient to form a belief as to the allegations contained in paragraph "17" of the complaint.

18. Defendant denies each and every allegation contained in paragraph "18" of the complaint.

19. Defendant denies knowledge or information sufficient to form a belief as to the allegations contained in paragraph "19" of the complaint.

20. Defendant denies each and every allegation contained in paragraph "20" of the complaint.

21. Defendant denies each and every allegation contained in paragraph "21" of the complaint.

22. Defendant reaffirms and realleges all previous admissions and denials plead to paragraphs "1" through "21" of the complaint.

23. Defendant denies each and every allegation contained in paragraph "23" of the complaint.

24. There are no factual allegations in paragraph "24" of the complaint and as a result, defendant is not required to admit or deny the allegations in paragraph "24" of the complaint.

25. Defendant denies each and every allegation contained in paragraph "25" of the complaint.

26. Defendant denies knowledge or information sufficient to form a belief as to the allegations contained in paragraph "26" of the complaint.

27. Defendant denies knowledge or information sufficient to form a belief as to the allegations contained in paragraph "27" of the complaint.

28A. Defendant denies knowledge or information sufficient to form a belief as to the allegations contained in paragraph "28A" of the complaint.

28B. Defendant denies knowledge or information sufficient to form a belief as to the allegations contained in paragraph "28B" of the complaint.

29. Defendant admits the allegations contained in paragraph "29" of the complaint.

30. Defendant denies knowledge or information sufficient to form a belief as to the allegations contained in paragraph "30" of the complaint.

31. Defendant denies knowledge or information sufficient to form a belief as to the allegations contained in paragraph "31" of the complaint.

32. Defendant denies knowledge or information sufficient to form a belief as to the allegations contained in paragraph "32" of the complaint.

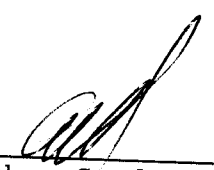
33. Defendant denies knowledge or information sufficient to form a belief as to the allegations contained in paragraph "33" of the complaint.

AS AND FOR A FIRST AFFIRMATIVE DEFENSE

34. Defendant asserts the bona fide error defense set forth in 15 U.S.C. § 1692k(c).

WHEREFORE, the Defendant respectfully requests that plaintiff's complaint be dismissed.

Dated: New York, NY
April 25, 2013



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